

## OPEN MEETING AGENDA ITEM



BEFORE THE ARIZONA CORPORATION COMMISSION

COMMISSIONERS

LEA MÁRQUEZ PETERSON, Chairwoman  
SANDRA D. KENNEDY  
JUSTIN OLSON  
ANNA TOVAR  
JIM O'CONNOR

IN THE MATTER OF POSSIBLE  
MODIFICATIONS TO THE ARIZONA  
CORPORATION COMMISSION'S  
ENERGY RULES

Docket No. RU-00000A-18-0284

Comments of Arizona PIRG Education Fund, the  
Southwest Energy Efficiency Project, and Wildfire

**Comments of Arizona PIRG Education Fund,  
the Southwest Energy Efficiency Project, and Wildfire**

On behalf of the Arizona PIRG Education Fund, the Southwest Energy Efficiency Project (SWEEP), and Wildfire, we write to reiterate our support for the Energy Rules and in particular its provisions that strengthen investment in energy efficiency — our least cost resource.

We ardently oppose any proposals that would weaken the Energy Rule's provisions on energy efficiency, and in particular Commissioner Olson's Proposed Amendments No. 1 and 3. These amendments would take Arizona backwards not forwards by undervaluing the financial benefits of energy efficiency and sending perverse signals to utilities to institute programs that would actually increase ratepayer bills and energy waste. For example, if the Commission uses the Ratepayer Impact Measure (RIM) test to evaluate energy efficiency cost effectiveness, as contemplated by Commissioner Olson's Proposed Amendment No. 1,<sup>1</sup> it would find a program that rips out insulation from people's homes, and thereby increases electricity sales, to be cost effective.

We encourage the Commission to act expeditiously to finalize and implement the Energy Rules by adopting the Recommended Opinion and Order.

**Diane E. Brown**  
Executive Director, Arizona PIRG Education Fund

**Caryn Potter**  
Manager, Utility Program, SWEEP

**Ellen Zuckerman**  
Director, Utility Program, SWEEP

**Cynthia Zwick**  
Executive Director, Wildfire

<sup>1</sup> <https://docket.images.azcc.gov/E000013197.pdf?i=1619803361923>